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Gibson Dunn's Ted Olson Registers as Foreign Agent for Saudi Arabia

A three-lawyer Gibson Dunn team discloses their advocacy for Saudi Arabia under the Foreign Agents Registration Act.

By C. Ryan Barber | September 12, 2018

Gibson, Dunn & Crutcher

(<https://www.law.com/law-firm-profile?id=119&name=Gibson-Dunn>)

partner Ted Olson, a former U.S. solicitor general who served under the George W. Bush administration, has registered (<https://efile.fara.gov/docs/6589-Short-Form-20180907-2.pdf>) as a foreign agent advocating for Saudi Arabia to defeat proposed legislation that would allow U.S. antitrust enforcers to target the Organization of the Petroleum Exporting Countries and its members.



Ted Olson of Gibson, Dunn & Crutcher.
Photo Credit: Diego M. Radzinski/ALM

Saudi Arabia, through its U.S. embassy, agreed last month to pay Gibson Dunn a flat fee of \$250,000 to prepare a "concise white paper, suitable for public dissemination, opposing" the proposed **legislation (<https://judiciary.house.gov/press-release/bipartisan-lawmakers-applaud-the-introduction-of-nopec-legislation/>)** titled "No Oil Producing and Exporting Cartels Act," which was introduced this year in the U.S. House of Representatives. The law would expose OPEC to U.S. prosecution for any antitrust violations.

Gibson Dunn will also prepare a more in-depth legal analysis of the bill, along with an op-ed opposing the legislation, according to a **letter (<https://efile.fara.gov/docs/6589-Exhibit-AB-20180907-1.pdf>)** Olson sent outlining the terms of Gibson Dunn's representation of Saudi Arabia. Washington-based Gibson Dunn litigation partner Amir Tayrani and associate Benjamin Hayes also registered to represent Saudi Arabia.

Received by NSD/FARA Registration Unit 09/07/2018 6:18:49 PM

U.S. Department of Justice
Washington, DC 20530

OMB No. 1124-0006; Expires May 31, 2020

**Exhibit A to Registration Statement
Pursuant to the Foreign Agents
Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional principal subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(f), accomplished by filing an electronic Exhibit A form at

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or statement filed under this Act is a public record open to public examination, inspection and copying during the posted hours at the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. Every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 552 of the Freedom of Information Act. Copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 552 of the Freedom of Information Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of the foreign principals they represent. This report is available to the public in print and online at:

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Field Office, Paperwork Project Manager, National Security Council, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Project Manager (0704-0188), Washington, DC 20503.

1. Name and Address of Registrant

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles CA 90071

2, 1

"In the event that you wish to expand the scope of the engagement to include meetings between myself and members of Congress regarding NOPEC, there will be an additional flat fee of \$100,000 per month to cover my time preparing for, and attending, such meetings," Olson wrote. Closing the letter, he added: "On behalf of Gibson, Dunn & Crutcher LLP, I look forward to a mutually rewarding relationship."

Gibson Dunn did not immediately comment on the new lobbying engagement. Saudi Arabia has engaged with, among other firms, **Hogan Lovells** (<https://assets.documentcloud.org/documents/4872920/HoganSaudi.pdf>), **Brownstein Hyatt Farber Schreck** (<https://assets.documentcloud.org/documents/4872917/BrownsteinSaudi.pdf>) and **King & Spalding** (<https://assets.documentcloud.org/documents/4872921/KingSpaldingSaudi.pdf>), according to Justice Department foreign-agent registrations.

The firm revealed the new lobbying in a disclosure to the Justice Department required by the Foreign Agents Registration Act, a 1938 law originally passed to reveal Nazi propaganda campaigns.

Eighty years later, the law has received **renewed attention** (<https://www.law.com/nationallawjournal/sites/nationallawjournal/2017/11/01/sl-nights-for-d-c-lobbyists-follow-manafort-indictment/>) amid the special counsel's prosecution of former Trump campaign chairman Paul Manafort on charges that include failing to register as a foreign agent in connection with his past lobbying work for the Russia-backed government of Ukraine. Manafort's trial on that allegation, along with others brought by special counsel Robert Mueller III, is set to begin next week in Washington's federal trial court.

Gibson Dunn's registration, dated Sept. 7, marked its first filing under FARA in more than 20 years. It came just weeks away from the 23rd anniversary of the end of the firm's previous representation of Saudi Arabia in the mid-1990s. In the **January 1996**

filing (<https://assets.documentcloud.org/documents/4872902/GibsonDunn96.pdf>), Gibson Dunn notified the Justice Department that its representation of Saudi Arabia had ended on Sept. 25, 1995.

Olson's registration wasn't his first as a lobbyist. He has appeared on a handful of U.S. Senate lobbying registrations over the years. In 2011, he was on the Gibson Dunn team that **registered (<https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=3C020774-78A4-49FC-A700-B5F59931DE31&filingTypeID=60>)** to lobby for the U.S. Chamber of Commerce on issues including derivatives legislation. Olson was also on the Gibson Dunn team that **registered (<https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=4C0B7AD5-7510-407D-B68F-FFA7E49AC8F4&filingTypeID=69>)** in 2010, also for the U.S. Chamber, to lobby on Dodd-Frank and campaign finance matters.

Read more:

3 Takeaways From Once-Secret Justice Dept. Memos on Foreign-Agent Lobbying (https://at.law.com/JE7wVb?cmp=share_twitter)

Big Law Steps Up to Praise Kavanaugh as Confirmation Hearing Winds Down (https://at.law.com/LfURvU?cmp=share_twitter)

Charge Against DC Lobbyist Boosts Focus on Foreign-Agent Registration (https://at.law.com/xa3L9N?cmp=share_twitter)

Maryland, DC AGs Clear Initial Hurdle in Trump Emoluments Lawsuit (https://at.law.com/ehQ3EV?cmp=share_twitter)

Gibson Dunn's Ted Olson Puts New Squeeze on Consumer Bureau (https://at.law.com/BiqziL?cmp=share_twitter)

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